

San Gabriel Mountains Community Collaborative

Unified Comments

August 11, 2015
Angeles National Forest
ATTN: Justin Seastrand
701 North Santa Anita Avenue
Arcadia, CA 91006

Dear Mr. Seastrand,

The San Gabriel Mountains Community Collaborative (SGMCC) is pleased to provide to the U.S. Forest Service (USFS) our joint comments regarding the San Gabriel Mountains National Monument (Monument) “Need to Change” Analysis.

The SGMCC consists of approximately 45 members representing a full range of interests (academic, business, civil rights, community, conservancies, cultural, environmental, environmental justice, ethnic diversity, education, youth, state and local government, Native American, public safety, recreation, special use permit holders, land lease holders, transportation, utilities, and water rights holders) associated with the Monument.

The mission of the SGMCC is to:

“Represent the general public by integrating diverse perspectives to identify, analyze, prioritize and advocate for values, resources, investments, management objectives and implementation practices that sustainably benefit all communities throughout the region, the Angeles National Forest and the San Gabriel Mountains National Monument.”

One key goal of the SGMCC is to:

“Provide a forum where diverse community voices can express their views and identify areas of agreement to help inform Forest Service decisions and activities”

Consequently, the SGMCC has reviewed the San Gabriel Mountains National Monument “Need to Change” Analysis and worked to develop the following joint comments that reflect a consensus among its members. The comments included herein are made with recognition that the Monument Management Plan will not adversely impact the existing and future water resources and supplies, flood control, utility, and telecommunications facilities within the Monument as described in the Proclamation. Due to the wide range of interests involved in developing these comments, the SGMCC believes that the USFS should give these comments appropriate consideration when developing its Monument Management Plan.

I. General Comments

The Proclamation (October 10, 2014) that established the San Gabriel Mountains National Monument requires the preparation of a US Forest Service ‘Monument Management Plan’ within 3 years. The Regional Forester (Randy Moore) decided to follow the 2012 Forest Service Planning Rule and to update the 2006 Angeles National Forest Land Management Plan (Forest Plan), based on the text in the Proclamation.

The 2012 Planning Rule includes environmental justice, climate resilience, sustainable recreation, and extensive community engagement. The ‘Need to Change’ analysis will identify those areas of the current Forest Plan that need to be updated so that the requirements identified in the Proclamation can be met.

The SGMCC believes that in its management of the Monument, the USFS shall consider activities that occur both inside and outside the boundaries of the Monument, to the extent that such activities impact the Monument, the National Forest, and surrounding communities.

The SGMCC also believes that the USFS shall partner with surrounding communities to protect existing uses and to eliminate or mitigate potential adverse impacts.

1. A 60-day Comment Period Is Requested

The SGMCC believes that there is significant value to the USFS in receiving consensus comments from a wide range of stakeholders on the Monument Management Plan. Both the length and timing of the original Need to Change 45-day comment period was sub-optimal from the perspective of Collaborative members. There was insufficient time for the SGMCC to schedule meetings, conduct community outreach and obtain the organizational approvals needed to provide feedback in a thoughtful manner. The extension to 60 days was appreciated, but provided the minimal amount of time needed to prepare joint comments.

Since the Monument Management Plan and associated environmental document will consist of a more extensive document package than the current Need to Change document, the SGMCC would encourage the USFS to provide a minimum 60-day public comment period for this next set of documents from the outset as well as initiate the comment period at a time that is compatible with the SGMCC’s meeting schedule to allow comments to be developed in a more orderly fashion. We believe comments on the Monument Management Plan should reflect the broadest, deepest and most meaningful community and stakeholder input possible.

2. A Monument Vision Statement Is Needed

The creation of a National Monument requires a new vision statement that specifically describes the long term vision for the Monument itself. Once a vision is developed, the SGMCC believes that in order to work towards the vision the USFS should utilize joint planning, collaboration & partnerships to the maximum extent feasible in its management of the Monument.

3. A Special Monument Website Should Be Created

The SGMCC envisions significantly more information being provided to the public in many languages. Consequently, a new, easily navigable, website should be created to contain this information and serve as a gateway to the new Monument as well as a resource to the local communities.

II. Comments on USFS Identified Need to Change Topics

1. Land Use Zones

A. Agreement With Proposed Land Use Zone Amendments

The San Gabriel Mountains Community Collaborative (SGMCC) concurs that the plan should be amended to recognize the additions of the Magic Mountain and Pleasant View Ridge Wilderness areas.

B. Additional Land Use Zone Analysis is Required

The SGMCC recommends that the objects of significance be mapped and overlaid with existing land use zones. Next, best management practices and suitable uses should be identified for protecting and interpreting the objects. Finally, an analysis of suitable uses within each zone should be conducted to determine if any changes in zone designations should be recommended.

In addition, when assessing Native American objects of interest requiring protection, the following types of objects should be included: 1) Resource Sites (for utilization of rocks, minerals, liquids, flora and fauna); 2) Circulation Route Sites (e.g. ancient trails across the San Gabriels); 3) Processing or Production Sites (e.g. bedrock mortar sites); 4) Enclosed or Maintained Space Sites (e.g. ancient Indian burned spaces sites); 5) Service Center Sites (e.g. cemeteries, sacred pictograph site CA-Lan-164); 6) Habitation Sites (ancient village sites); and 7) Disposal Sites (where ancient refuse was deposited, these sometimes occur away from a habitation site and can be productively studied to learn of the ancient cultural practices).

C. An Ongoing Analysis of Impacts Should Occur

The SGMCC understands that USFS intends to conduct an ongoing analysis of potential impacts to objects identified in the Proclamation. This process should allow for a transparent assessment of impacts.

2. Transportation Plan

The Proclamation requires the preparation of a Transportation Plan that specifies and implements actions necessary to protect the objects identified in the Proclamation, including road closures and travel restrictions as needed. All existing roads and trails within the Monument should be part of this plan. This would include Forest Service, federal, state, county, local, special-use or otherwise authorized roads and trails whether currently open or closed as well as temporary, unclassified and user-created roads and trails.

The SGMCC does not interpret the Proclamation to prohibit new road or trail construction, reconstruction, realignment, improvement, or use designations, so long as these activities are consistent with protecting identified objects. However, due to the overarching priority to protect identified objects, any such modifications, including changes to a designated use, must be thoroughly assessed prior to the change being implemented, to ensure that these objects have been adequately protected.

The SGMCC does not interpret the Proclamation to directly reduce the existing area designated for off-highway vehicle (OHV) use nor change the existing rights and obligations of non-Forest Service road users and special use permit holders. The Forest Service should identify and evaluate whether or not to close unauthorized, user-created routes, trails, or use areas not part of the designated route system. However, existing roads, trails and areas designated for OHV use may need to be reassessed to protect identified objects.

The Forest Service should identify and comment on the potential impacts of the proposed high speed rail system on the National Monument.

The SGMCC supports the approach to the preparation of the required Monument Transportation Plan outlined in the “Need to Change” document, as well as the four existing Angeles National Forest Transportation Strategies listed in Part 2 of the current ANF Land Management Plan:

Trans 1 - Transportation System;

Trans 2 - Unnecessary Roads;

Trans 3 – Improve Trails; and

Trans 4 - Off-Highway Vehicle Opportunities.

However, due to the higher visitor usage that is expected within a National Monument as well as the SGMCC’s vision of the enhanced role that the Monument will play within the community, the SGMCC supports including these additional comprehensive measures within the Monument Transportation Plan:

A. Develop a Comprehensive Transportation Management Implementation Plan

The USFS should prepare a more detailed working document based on the Monument Transportation Plan that will be kept up-to-date and can be shared with transportation development partners such as state and local governments, transportation providers, legacy trail maintenance volunteer groups, SGMCC members, etc., to guide sustainable transportation activities. This plan should consider and address the entire integrated road and trail system within the Monument, not just the portion of the system operated by the USFS. This will require multi-jurisdictional coordination and consensus on items such as operation, maintenance, and funding responsibilities. Among other items, the SGMCC would like to see this plan contain:

- Near & long term Monument transportation goals;
- A map identifying the status and future plan for each existing road in the Monument;
- A comprehensive plan for trail enhancements, including re-opening trails that are currently closed;
- A map identifying the key features of the Monument with options for multi-modal access to these locations;
- A mechanism for coordinating with gateway communities on an ongoing basis regarding Monument transportation plans and identified interface issues;
- An ordered priority list of identified, needed transportation projects, with priority given to:
 - Providing public transportation options – “Transit to Trails”
 - Resolving issues in gateway communities
 - Opening roads currently closed to public use for maintenance, safety or other reasons to provide enhanced access for recreational opportunities
 - Opportunities for new trails
 - Necessary trail enhancements
 - Safety related projects, e.g., guardrails, turnouts, bike lanes or other facilities, emergency call boxes, mile markers, patrol networks, separation of uses, signage, etc.

- Reaching final resolution of the Hwy 39 closed segment
- Enhancing ADA access
- Increasing active transportation options
- Consideration of seasonal road closures to protect seasonally sensitive species vs. permanent closures
- Actions to address unauthorized or illegal roads, parking and social trails;
- Assurance that the plan will not unnecessary impede or delay emergency actions needed to repair roads managed by special use permit holders;
- Enhanced enforcement measures;
- A long term care and maintenance plan for the transportation network;
- Monitoring/tracking information such as visitor counts & road usage that can be used to guide future transportation actions; and
- A budget sufficient to support plan activities. Although the plan is expected to be aspirational, it should identify what can realistically be achieved within the available budget. Identified enhancement projects can be implemented in phases as budget becomes available. When developing the budget, alternative methods of funding, in-kind contributions, and volunteer groups should be utilized in order to leverage USFS resources.

All future transportation projects must go through the required NEPA/CEQA process and include an opportunity for public comment. Vendors should include local diverse business enterprises.

B. Consider the Entire Transportation Route into the Monument and its Interface with Surrounding Communities

This plan should specifically include consideration of the routes that visitors take to reach the Monument which lie outside the Monument. The USFS should work with external entities (state, counties, cities, transportation agencies, foundations, etc.) to develop a sustainable system of transportation into and throughout the Monument that does not significantly disturb or alter existing community character, especially residential neighborhoods that abut boundaries of the Monument. In particular, off-site parking options that are consistent with gateway community plans should be developed to reduce the overcrowding of motor vehicle use within the Monument and the problems associated with unmanaged parking outside the Monument.

C. Enhance Non-Motorized Access Options

Active transportation and multi-modal options should be provided and are critical components in implementing sustainable and equitable access to the Monument. The USFS should specifically work to link the Monument transportation system with existing external walking, biking, equestrian, public transportation systems and other urban networks, including services for disabled, to enhance non-motorized Monument access. Transit to Trails programs help reduce traffic congestion and parking problems, improve air quality and reduce run-off of polluted water into rivers and the ocean.

D. Develop To-Monument and Within-Monument Public Transportation Options

The USFS should work to implement a Monument public transportation system to reduce vehicle loading within the Monument. The system should transport visitors into the Monument from public transportation terminals, satellite parking or other locations to high use areas, and provide a method to move within the Monument to various sites without the need to use a car and accessible to the disabled. Consider a funicular system to provide access to viewpoints or trails in high use and more developed areas. Work with parties interested in developing plans to transport groups of urban students into the Monument for educational purposes.

E. Provide Enhanced Online Transportation Information

The USFS should develop a multi-lingual Monument webpage with additional transportation information for visitors, including but not limited to information on the following topics:

Americans with Disabilities Act (ADA) - Accessible recreational opportunities, parking and other access information.

Parking – A listing and map identifying all approved internal and external parking options and key information (hours, fees, etc.).

Monument Transportation System – Information on any to-Monument or within-Monument transportation systems (hours, fees, etc.) as well as local Transit to Trails programs.

Non-Motorized Access Options – Provide maps and information showing linkages to walking, biking, equestrian, and public transportation systems that can be used to access the Monument.

Trailer Access/Parking – Information on where to park equestrian & OHV trailers to best access Monument trails.

Motorcycles – Safety information for riding motorcycles safely within the Monument, especially with regard to popular scenic routes such as Hwy 2.

Trails – Identify all trails, allowed usage (hiking only, biking, equestrian, etc.), and difficulty levels to allow visitors to better plan their visit in advance. Complete a trail characterization project based on accepted trail assessment protocols to help ensure trail users can safely match their skills and abilities to appropriate trail options.

OHV Roads – Identify all open roads and provide helpful usage and safety information.

F. Provide Enhanced Signage/Markers

Consistent with the above information, the USFS should install and properly maintain a comprehensive transportation signage system within the Monument as well as within the forest leading into the Monument. Signs should also be posted to ensure Monument visitors avoid trespassing on private property inside or outside the Monument or parking in unauthorized areas within local communities. Multilingual signage/marker information should be provided where appropriate.

3. Recreation

The Proclamation discusses the regional importance of the recreation opportunities the Monument provides in the context of both the historic recreational use of the Forest and the large urban

population surrounding the area. In this context, we disagree that “...no changes are recommended” for ‘Recreation Management’.

Although there is existing direction for recreation included in all three parts of the current Forest Plan (e.g., Vision, Strategy & Design Criteria), the Proclamation specifically focuses on the recreation needs of the connected communities and the expectation that the new Monument can meet these needs (see, for example Paragraphs 1, 7, 9, 12 & 13). While the Proclamation makes no specific commitment to recreational development, there are ample references to meeting the existing, and new recreation challenges and opportunities of urban, rural and interface communities.

The SCMCC supports the five existing Angeles National Forest Recreation Strategies listed in Part 2 of the current ANF Land Management Plan:

- REC 1 – Recreation Opportunity;
- REC 2 – Sustainable Use and Environmental Design;
- REC 3 – Recreation Participation
- REC 4 – Conservation Education; and
- REC 5 – Recreation Special Use Authorizations

However, in order to achieve our desired vision, we believe that more work is needed and are confident that application of the 2012 Planning Rule will achieve that end.

4. Minerals/Mining

The proclamation has withdrawn lands in the Monument from all forms of mineral exploration and development except the 1947 Materials Act. This withdrawal is subject to “valid existing rights,” which entails that all mineral authorizations that existed at the time the Monument was designated on October 10, 2014 will continue.

The Monument Management Plan will have to address consistency with the Proclamation’s withdrawal provisions.

III. Closing

Thank you for this opportunity to provide comments on the Need to Change document.

With the 2012 Planning Rule, we welcome a new era of collaboration and participation between the USFS and the diverse urban population surrounding the Monument. We look forward to working with you further throughout this process as we work together to achieve our joint vision for the Monument.

Regards,

The San Gabriel Mountains Community Collaborative

**San Gabriel Mountains Community Collaborative
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